

**REMARKS/ARGUMENTS**

The Examiner is thanked for the performance of a thorough search.

By this amendment, Claims 1, 12, 14, 15, and 23-25 have been amended. Claim 21 has been cancelled. No claims have been added. Hence, Claims 1-20 and 22-25 are pending in the application.

The amendments to the claims as indicated herein do not add any new matter to this application. Furthermore, amendments made to the claims as indicated herein have been made to exclusively improve clarity of the claims and not for the purpose of overcoming alleged prior art.

**SUMMARY OF THE REJECTIONS/OBJECTIONS**

Claims 1-25 were objected to because DML was not defined in the introduction. An appropriate correction has been made.

Claims 15-25 were rejected because the method allegedly does not produce a “useful, tangible, and concrete” result in that the result returned allegedly may be embodied in a carrier wave. Claim 15 was amended in the First Office Action to recite “[A] computer-readable medium **storing** a set of instructions...” (emphasis added). It is respectfully submitted that a carrier wave cannot be stored on a computer-readable medium. Therefore, removal of this rejection with respect to Claims 15-25 is respectfully submitted.

Claims 1-7, 10, and 15-25 were rejected under 35 U.S.C. § 102(b) as anticipated by reference PL/SQL User’s Guide Reference Release 2 (9.2) chapter 5, page 53 (hereinafter “[A]”). This rejection is traversed.

Claims 8, 9, 11, 13, 22, and 24 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over [A] in view of Oracle9i SQL Reference, Release 2 (9.2) Aggregate Functions, 2000 pages 4-6 to 4-8 (hereinafter “[B]”).

### THE REJECTIONS BASED ON THE PRIOR ART

Claims 1-7, 10, and 15-25 were rejected under 35 U.S.C. § 102(b) as anticipated by [A]. Present Claim 1 recites:

A method comprising:  
 receiving a database statement that  
     specifies a data manipulation language (DML) operation that modifies data in  
         one or more columns in a database, and  
     contains a clause that specifies an aggregate operation to be performed on a  
         plurality of values associated with the data, **wherein each of the  
         plurality of values are from a separate row**; and  
 in response to receiving the database statement,  
     performing the DML operation on the one or more columns in the database,  
     performing the aggregate operation on the plurality of values, and  
     returning as a result of the database statement a result of the aggregate  
         operation. (emphasis added)

The Office Action cited page 53 of Chapter 5 of [A] as allegedly teaching “a database statement that...contains a clause that specifies an aggregate operation to be performed on a plurality of values associated with the data.” This is incorrect. The example provided on page 53 that is used in the rejection includes the following:

```
BEGIN
    emp_id := 7782;
    UPDATE emp SET sal = sal * 1.1
        WHERE empno = emp_id
        RETURNING ename, job, sal INTO emp_info;
END
```

The Office Action asserts that the values of “ename”, “job”, and “sal” are aggregated into the emp\_info variable. It is respectfully submitted that **such an operation is not an aggregate**

**operation. Rather, aggregate operations are operations that operate on multiple values that are each from a separate row (or record).** Examples of aggregate operations may include summing a plurality of values, counting the number of values, averaging the plurality of values, computing the standard deviation of the plurality of values, and determining the median of the plurality of values.

Claim 1 has been amended to clarify that the aggregation operation is performed on the plurality of values, where **each of the plurality of values are from a separate row.** The reference [A] does not teach that the values of “ename”, “job”, “sal” that are returned in emp\_info are from separate rows. In fact, the values are part of the same row (or record), where each row corresponds to a different employee. Thus, for a particular employee, the value of “ename” is that employee’s name, the value of “job” is that employee’s job title, and the value of “sal” refers to that employee’s yearly salary.

Based on the foregoing, because [A] fails to teach all the features of Claim 1, it is respectfully submitted that Claim 1 is patentable over [A]. Removal of the rejection with respect to Claim 1 is respectfully requested.

#### CLAIM 15

Claim 15 recites the features of Claim 1 discussed above except in the context of a computer-readable medium. Therefore, Claim 15 is patentable over [A] for the same reasons given above with respect to Claim 1. Removal of the rejection with respect to Claim 15 is respectfully requested.

## DEPENDENT CLAIMS

The pending claims not discussed so far are dependant claims that depend on an independent claim that is discussed above. Because each of the dependant claims includes the limitations of claims upon which they depend, the dependant claims are patentable for at least those reasons the claims upon which the dependant claims depend are patentable. Removal of the rejections with respect to the dependant claims and allowance of the dependant claims is respectfully requested. In addition, the dependent claims introduce additional limitations that independently render them patentable. Due to the fundamental difference already identified, a separate discussion of those limitations is not included at this time.

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Mail Stop AF, Commissioner for Patents, P. O. Box 1450, Alexandria, VA 22313-1450

on September 21, 2006

by

  
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